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JUL 2 5 2008

July 24, 2008

BY UPS NEXT DAY AIR

Hon. Ronald L. Ellis United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 1970 New York, New York 10007

Re: Syed Mumtaz, et al. v. Pakistan International Airlines, et al. Civil Action No. 08 Civ. 1586 (BSJ) (RLE)

Dear Judge Ellis:

We represent Defendants Pakistan International Airlines, Rashid Farookee, Rehan Ali, Arbab Habatullah, and Haider Ali (collectively "Defendants") in the above-referenced matter. We write to request an extension of the date set by the Court for the end of discovery in this case, which is now scheduled as July 31, 2008.

The July 31 date was set in anticipation of a ruling on Defendants' motion to dismiss the Complaint, which was fully submitted before Judge Barbara Jones on May 12, 2008. Judge Jones, however, has not yet issued a decision with respect to Defendants' motion to dismiss. In addition, the parties are now engaged in settlement discussions that may be able to resolve the case.

In light of our pending motion to dismiss, we respectfully request that the date for discovery to end in this matter be extended from July 31, 2008 to 60 days after Judge Jones issues a ruling with respect to Defendants' motion to dismiss. This is the first request for an extension of the discovery closure date.

We have attempted to contact all of the *pro se* plaintiffs with respect to dur request at the telephone numbers listed on the Complaint. Unfortunately, we have only received a response from Plaintiff Syed Mumtaz, who is willing to consent only to a one-month extension of the discovery deadline.

PROSKAUER ROSE LLP

Hon. Ronald L. Ellis July 24, 2008 Page 2

Respectfully submitted,

Michael J. Lebowich

ce: Mr. Syed Mumtaz Mr. Abdul S. Baig

Mr. Qamar Doja Mr. Gilbert Ruiz By Tridge Jones

60 ORDERED

MAGISTRATE JUDGE ROMALD L. ELLIS